



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502  
www.deq.idaho.gov

C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

September 26, 2017

Jennie Kent, Facility Engineer  
Alta Mesa Services, LP  
15021 Katy Freeway  
Houston, Texas 77094

RE: Request for Additional Information Regarding the Air Quality Inspection of the Little Willow Road Gathering Facility; Facility ID No. 075-00022

Dear Ms. Kent:

On August 25, 2017, the Department of Environmental Quality (DEQ) conducted an air quality inspection of the Alta Mesa Services, LP (Alta Mesa), Little Willow Road Gathering Station facility. The inspection was conducted pursuant to the requirements of Permit to Construct (PTC) No. P-2015.0015 issued on February 22, 2016, 40 CFR 60 Subparts OOOO and JJJJ, and 40 CFR 63 Subpart HH.

During this inspection, the applicability of the requirements of 40 CFR Subpart OOOO was discussed. During the inspection, Alta Mesa staff maintained that, while Alta Mesa was subject to the requirements of Subpart OOOO, none of the equipment listed in PTC No. P-2015.0015 was applicable to any of the provisions of Subpart OOOO. This assertion differs from the rule applicability information provided by Alta Mesa in the permit application. The permit was issued with 27 pages (approximately 120 conditions) devoted to Subpart OOOO requirements and it appears Alta Mesa has not previously disputed the applicability of these requirements.

On December 15, 2015, DEQ received an application for a revised PTC from Alta Mesa. The following statements were contained on page 3 of Section 6 of the application :

40 CFR 60 Subpart OOOO

**§60.5360 What is the purpose of this subpart?**

This subpart establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011.

***RESPONSE: The Little Willow Road Gathering Facility is subject to this rule and thus the purposes outlined here are applicable.***

**§60.5365 Am I subject to this subpart?**

(c) Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

***RESPONSE: The Little Willow Road Gathering Facility is not a single reciprocating compressor servicing a single well site. The reciprocating compressors associated with this project service multiple well sites and will comply with applicable portions of this rule.***

This statement appears to indicate that the reciprocating compressor currently in operation at this facility is subject to the requirements of Subpart OOOO and must therefore comply with the Subpart OOOO requirements.

40 CFR 63 Subpart HH

Pages 79-112 of Section 6 of the application discuss the requirements of 40 CFR 63 Subpart HH- Glycol Dehydrators. Alta Mesa operates a glycol dehydrator at this facility. Subpart HH states that glycol dehydrators located at major or area sources of hazardous air pollutants are subject to the requirements of Subpart HH. §60.764(e)(ii) notes that if the actual emissions of benzene from the glycol dehydration unit process vents are less than 0.90 megagrams (1.0 tons) per year the unit is exempt from the requirements of the subpart. The emission inventory section (4.0) of the application documents the benzene emissions from the glycol dehydration unit as 0.0056 tons per year, yet no statement from Alta Mesa concerning the applicable requirements status of Subpart HH appears in the application, nor is Subpart HH discussed on the PTC or the associated Statement of Basis.

DEQ is requesting that Alta Mesa prepare a revised regulatory analysis clarifying the applicability of the requirements of 40 CFR 60 Subpart OOOO, 40 CFR 60 Subpart OOOOa, and 40 Subpart 63 Subpart HH to the equipment currently in operation at the Little Willow Rd. Gathering facility. Please be aware that 40 CFR 60 Subparts OOOO and OOOOa were revised as of August 2, 2016 (see FR Vol. 81, No. 107, published June 3, 2016, pages 35824-35942, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources). Please submit the revised regulatory analysis with an application to revise the permit to accurately reflect the federal rule requirements within 30 days of the receipt of this letter to:

Darrin Pampaian, Air Quality Permit Coordinator  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706  
(208) 373-0587  
[darrin.pampaian@deq.idaho.gov](mailto:darrin.pampaian@deq.idaho.gov)

Jennie Kent  
September 26, 2017  
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Please call me at (208) 373-0312 if you have any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Anderson', with a stylized, cursive script.

Tom Anderson  
Air Quality Analyst  
Technical Services Division

TA:slt

EC: Thomas Krinke, Boise Regional Office  
J.R. Fuentes, Boise Regional Office  
David Luft, Boise Regional Office  
Zach Klotovich, Technical Services Division  
Darrin Pampaian, Air Quality Division  
Kelli Wetzel, Air Quality Division  
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